UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION

UNITED STATES OF AMERICA	)	
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	)	
V.	)	
	)	
	)	
ANNIE NICOLE RITENOUR	)	Case No. ___3:21mj00035___
	)	
	)	

AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT

I, Andrew Clouser, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1.   I am a Special Agent with the Federal Bureau of Investigation (FBI), United States Department of Justice, currently assigned to the Charlottesville Resident Agency. I have been an FBI Special Agent since December 2020 and have been assigned to the Richmond Division since December 2020. My duties involve the investigation of a variety of violations of federal offenses, including violent crimes, public corruption, and other violations of federal law.

2.   This Affidavit is submitted in support of a criminal complaint against, and arrest warrant for, Annie Nicole Ritenour ("RITENOUR") for a violation of 18 U.S.C § 373 (Solicitation to Commit a Crime of Violence) and 18 U.S.C. § 1958 (Murder-For-Hire).

3.   The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the

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requested complaint and does not purport to set forth all of my knowledge of or investigation into this matter.

INFORMATION REGARDING BITCOIN

4.   Bitcoin is a type of virtual currency, circulated over the Internet. Bitcoins are not issued by any government, bank, or company, but rather are controlled through computer software operating via a decentralized, peer-to-peer network. Bitcoin is just one of many varieties of virtual currency.

5.   Bitcoin are sent to and received from Bitcoin "addresses." A Bitcoin address is somewhat analogous to a bank account number and is represented as a 26-to-35-character-long case-sensitive string of letters and numbers. Each Bitcoin address is controlled through the use of a unique corresponding private key. This key is the equivalent of a password, or PIN, and is necessary to access the funds associated with a Bitcoin address. Only the holder of an address' private key can authorize transfers of bitcoin from that address to other Bitcoin addresses. Users can operate multiple Bitcoin addresses at any given time and may use a unique Bitcoin address for each and every transaction.

6.   A Bitcoin wallet is used to store cryptocurrency and can control multiple Bitcoin addresses. The wallet interfaces with the blockchain and uses private keys to restrict access to spending Bitcoin.

7.   To acquire bitcoin, a typical user purchases them from a virtual currency exchange. A virtual currency exchange is a business that allows customers to trade virtual currencies for other forms of value, such as conventional fiat money (e.g., U.S. dollars, Russian rubles, euros). Exchanges can be brick-and-mortar businesses (exchanging traditional payment methods and

virtual currencies) or online businesses (exchanging electronically transferred money and virtual currencies). Virtual currency exchanges doing business in the United States are regulated under the Bank Secrecy Act and must collect identifying information about their customers and verify their clients' identities.

8.   To transfer bitcoin to another Bitcoin address, the sender transmits a transaction announcement, which is electronically signed with the sender's private key, across the peer-to-peer Bitcoin network. To complete a transaction, a sender needs only the Bitcoin address of the receiving party and the sender's own private key. This information on its own rarely reflects any identifying information about either the sender or the recipient. As a result, little-to-no personally identifiable information about the sender or recipient is transmitted in a Bitcoin transaction itself. Once the sender's transaction announcement is verified by the network, the transaction is added to the blockchain, a decentralized public ledger that records every Bitcoin transaction. The blockchain logs every Bitcoin address that has ever received bitcoin and maintains records of every transaction for each Bitcoin address.

9.   While a Bitcoin address owner's identity is generally anonymous within the blockchain (unless the owner opts to make information about the owner's Bitcoin address publicly available), investigators can use the blockchain to identify the owner of a particular Bitcoin address. Because the blockchain serves as a searchable public ledger of every Bitcoin transaction, investigators can trace transactions to, among other recipients, Bitcoin exchangers. Because Bitcoin exchangers generally collect identifying information about their customers, as discussed above, subpoenas or other appropriate legal process submitted to exchangers can, in some instances, reveal the true identity of an individual responsible for a Bitcoin transaction.

PROBABLE CAUSE

10.   On or about September 16, 2021, FBI Knoxville contacted FBI Charlottesville to advise they had information they believed to be a threat to life. Through a Confidential Human Source (CHS), FBI Knoxville obtained information from a website that advertised murder-for-hire services, hereinafter referred to as - "The Website." As law enforcement presently understands, although The Website offered murder-for-hire services, it never actually delivered on the promised services after receiving payment from its customers.

11.   Upon reviewing a screen capture of The Website's homepage, I saw that it advertised murder-for-hire services. The Website advertised "[W]e can kill any person you want, as long as it is not a president or very important person that is guarded by the military." The Website further advertised "We can make the murder look accidental, so that Police will not suspect anyone.

12.   According to FBI Knoxville, RITENOUR created an account with The Website and sent The Website Bitcoins with a total market value at the time of approximately $3,200 in an effort to solicit and hire a "hitman" to kill an identified person herein after referred to as "VICTIM." The money was converted and sent to The Website using the currency conversion company AmericanCrypto.

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14.   FBI Knoxville also provided this office with purported excerpts of communications on The Website between RITENOUR and The Website administrators. Within these

communications, on or about June 25, 2021, RITENOUR asked the administrator of The Website

how she would show proof she had enough money for a job to be performed. RITENOUR asked

this question multiple times on that same day between the approximate times of 8:30pm and

8:45pm. On or about June 26, 2021, the administrator responded, "Hi, I see you have added funds

to escrow. This is proof you have funds please add difference and we can do job.".

15.   On or about June 26, 2021, at approximately 6:00am, RITENOUR placed an

"order" with The Website to utilize its murder-for-hire services. RITENOUR named the order

"shoot and get away" and uploaded an image of VICTIM. RITENOUR included the address of

VICTIM's workplace which returned to a department store in central Virginia where VICTIM

was, at the time, actually employed. In her order RITENOUR also included the following

instructions:

> "I am just looking for a simple quick job. The address of the person will be the
> best place to make the target, as it's his workplace (XXXX's). He works 6am to 3
> pm Monday through Friday. He drives a ███████████████████████,
> license plate ***-****. The days/time I mentioned will be the best time and place,
> I would say wait until he's off at 3 and then make your move.".

16.   In October 2021 the FBI obtained records of financial transactions from

AmericanCrypto, a crypto currency exchange business. AmericanCrypto helps customers to

convert standard currency to Bitcoin and then send that Bitcoin to the vendor or business of the

customer's choice. The records provided by AmericanCrypto showed transactions made by

RITENOUR *via* a Bitcoin ATM machine to include invoice numbers, block chain addresses, the

amount of currency that was converted to Bitcoin, and the ATM location in which the transaction

occurred. The records showed RITENOUR made a total of three transactions to The Website

between June 23, 2021 and June 24, 2021 for a total currency conversion of approximately

$4,000 to Bitcoin. According to the records, the transactions occurred at approximately 3:46pm on June 23, 3:52pm on June 23, and 3:49pm on June 24. Multiple charges and fees associated with the transactions resulted in approximately $3,200 being received by The Website. AmericanCrypto also provided still photos from the ATM machine which show RITENOUR making these aforementioned transactions.

CONCLUSION

17.   Based on the foregoing, there is probable cause to believe that RITENOUR committed a violation of 18 U.S.C. § 373 (Solicitation to Commit a Crime of Violence) and § 1958 (Murder-For-Hire).

OATH

The information in this affidavit is true to the best of my knowledge and belief.

Respectfully submitted,
s/Andrew Clouser
Andrew Clouser, Special Agent
Federal Bureau of Investigation

Received by reliable electronic means and sworn and attested to by telephone on this _____ day of October 2021.

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JOEL C. HOPPE
UNITED STATES MAGISTRATE JUDGE